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7 **UNITED STATES BANKRUPTCY COURT**
8 **NORTHERN DISTRICT OF CALIFORNIA**
9 **SAN FRANCISCO DIVISION**

10 **In re:**

11 **PG&E CORPORATION,**

12 **- and -**

13 **PACIFIC GAS AND ELECTRIC**
14 **COMPANY,**

15 **Debtors.**

- 16 ☐ Affects PG&E Corporation
17 ☐ Affects Pacific Gas and Electric Company
18 ☒ Affects both Debtors
19 * *All papers shall be filed in the Lead Case,*
20 *No. 19-30088 (DM).*

Case No. 19-30088 (DM)

Chapter 11

**OPPOSITION BY TYRRELL
RESOURCES, INC. TO THE
MOTION OF THE DEBTORS AND
REORGANIZED DEBTORS TO
APPROVE ADR AND RELATED
PROCEDURES FOR RESOLVING
GENERAL CLAIMS**

[Dkt. No. 8970]

**JOINDER TO OBJECTION FILED
BY TURNER CONSTRUCTION
COMPANY**

[Dkt. No. 9040]

Date: September 22, 2020

Time: 10:00 a.m. (Pacific Time)

Place: (Telephonic or Video Only)

**United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102**

Objection Deadline:

Sept. 15, 2020, 4:00 pm

21 Tyrrell Resources, Inc. (Tyrrell”) hereby files this Opposition to Motion (**Dkt No.**
22 **8970**) (“Motion”) to approve ADR and related procedures for resolving general claims, filed
23 by the Debtors and reorganized Debtors (“PG&E”). Tyrrell joins in the Objection to the
24 Motion filed by Turner Construction Company. **Dkt. No. 9070.**

25 PG&E hired Tyrrell to perform emergency fire debris removal services in the

1 aftermath of the Paradise Fire, and prior to that to perform vegetation management services.
2 On October 21, 2019, Tyrrell timely filed a detailed proof of claim with exhibits (**Claim No.**
3 **79094**) in the amount of \$281,024.50.

4 Tyrrell has received no communication from PG&E relating to its claim, except that
5 recently, the undersigned counsel received a response that PG&E is attempting to reconcile
6 Tyrrell's invoices. Under the Plan, general unsecured claims such as Tyrrell's are to be "paid
7 in full on the Effective Date or as soon as reasonably practicable thereafter." The Plan was
8 effective July 1, 2020. Tyrrell contends that, with respect to payment of its claim, PG&E is
9 not complying with the Plan.

10 PG&E has filed a very complicated motion to approve alternate procedures for
11 settlement of claims. The motion is based upon 11 U.S.C. § 105(a). The Official Unsecured
12 Creditors Committee is no longer monitoring matters such as this. PG&E is asking the court
13 to impose requirements and procedures other than the mandatory provisions of the confirmed
14 Plan and the Bankruptcy Code, and is asking for a further 6 months' time to object to Tyrrell's
15 claim. PG&E has already had close to two years to reconcile Tyrrell's invoices and no
16 apparent progress has been made. Tyrrell is a small business for which this trade claim is
17 very significant. There are no grounds for a further extension.

18 Tyrrell objects to the Motion on the grounds that PG&E has not provided sufficient
19 basis to limit or vary from the mandatory detailed procedures set forth the in the Plan and the
20 Bankruptcy Code concerning objections to claims, particularly as it relates to Tyrrell's claim
21 which should have already been resolved. Tyrrell further objects to the unwarranted request
22 for additional time to object to the claim. Tyrrell requests that the Motion be denied as it
23 relates to Tyrrell's claim.

24 Dated: September 15, 2020

Parkinson Phinney

25 By: /s/ Thomas R. Phinney
26 Thomas R. Phinney
27 Attorneys for Tyrrell Resources, Inc.
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